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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$10,979.00 IN
U.S. CURRENCY,
15 Defendant.
16

2:22-MC-00046-TLN-AC

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Angelina
18 Perez (“claimant”), by and through their respective counsel, as follows:

19 1. On November 8, 2021, the claimant filed a claim in the administrative forfeiture proceedings
20 with the Federal Bureau of Investigation with respect to the Approximately \$10,979.00 in U.S. Currency
21 (hereafter “defendant currency”), which was seized on August 10, 2021.

22 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
23 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
24 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant
25 has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.
That deadline is February 6, 2022.

4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to April 7, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

5. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to April 7, 2022.

Dated: 2/2/22

PHILLIP A. TALBERT
United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

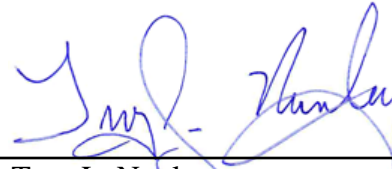
Dated: 2/2/22

/s Kimberly Hunt
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Attorney for potential claimant
Angelina Perez

(Signature authorized by email)

IT IS SO ORDERED.

Dated: February 8, 2022



Troy L. Nunley
United States District Judge